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MONTANA

COMMUNITY DEVELOPMENT

BLOCK GRANT PROGRAM

DESCRIPTION

Montana Department of Commerce

Helena, Montana

June 1, 1982

DEPARTMENT OF COMMERCE

TED SCHWINDEN, GOVERNOR

CAPITOL STATION
1424 9TH AVENUE

STATE OF MONTANA

(406) 449-3494

HELENA, MONTANA 59620-0401

June 1, 1982

TO: All Persons Interested in Montana's Community Development Block Grant Program

Amendments made to the Federal Housing and Community Development Act by Congress in 1981 provided for the transfer of administration of the Community Development Block Grant (CDBG) Program for communities under 50,000 population from the Federal government to the states. The Program description which follows, sets out the policies and procedures which will be followed by the Department of Commerce in administering Montana's CDBG Program and in allocating Federal Fiscal Year 1982 CDBG funds. This document represents the efforts of the CDBG Task Force, a fourteen-member group of local officials who advised the Department in the development of the program during the past five months, as well as the contributions of many others who took the time to write, telephone or talk with us at a number of CDBG public meetings held across the state. I would like to express our appreciation to all those who assisted us so generously in this undertaking. We will continue to welcome your suggestions for improving the CDBG Program's efficiency and effectiveness in responding to Montana's diverse community development needs.

If you have any questions or comments regarding Montana's CDBG Program, please contact the Economic and Community Development Division at (telephone) 449-3757.

Sincerely,

Gary Buchanan, Director
Department of Commerce

GB/ke

AN EQUAL OPPORTUNITY EMPLOYER

TABLE OF CONTENTS

		Page
I.	INTRODUCTION	
	A. Background	1
	B. State Administration of the "CDBG" Program	1
	C. The CDBG Task Force	3
II.	PROGRAM DESCRIPTION	
	A. Program Objectives and General Policies	5
	B. Eligible Activities	6
	C. Eligible Applicants	10
	D. Types of Grants Available	11
	E. Distribution of Funds and Grant Ceilings	13
III.	POLICIES AND PROCEDURES FOR APPLICATION	
	A. General Policies for All Applicants	16
	B. Special Requirements for Project Categories	19
IV.	RANKING APPLICATIONS	
	A. General Information	22
	B. Project Impact System	22
	C. Local Government Status System	29
	D. Ranking Process	30
	E. Applicant Appeal	32
Appendix A	Definitions of "Low and Moderate Income," by County	33
Appendix B	Statement of Assurances	38
Appendix C	Local Government Status Scores	43

I. INTRODUCTION

A. Background

The Community Development Block Grant (CDBG) Program was established by the Housing and Community Development Act of 1974 and has been administered by the U.S. Department of Housing and Urban Development (HUD). The program was designed to help communities meet their greatest community development needs, with particular emphasis on assisting persons of low and moderate incomes.

The CDBG Program is divided into two major categories: "entitlement" communities, which are communities with 50,000 or larger populations and "non-entitlement" communities, with populations under 50,000. In Montana, only Billings and Great Falls are entitlement communities. The non-entitlement CDBG program has most commonly been referred to as the "Small Cities" Program. The "Small Cities" CDBG Program has been an important source of funding for Montana communities for dealing with a variety of community development problems. In the seven years that HUD has administered the program, 46 cities, towns and counties have competed successfully for over $23 million in grants.

B. State Administration of the CDBG Program

The 1981 amendments to the federal legislation make the non-entitlement "Small Cities" portion of the Community Development Block Grant program available as an optional state-administered program with the state totally responsible for the program. Prior to this time the only state role has been the technical assistance provided to Montana communities in the preparation of their grant applications and participation in HUD's evaluation and ranking of applications.

In recent years, the "Small Cities" funding levels for Montana have been as follows:

Fiscal Year 1979	$3,622,000
Fiscal Year 1980	$5,756,000
Fiscal Year 1981	$5,595,000

The allocation for Fiscal Year 1982 is $6,109,000. $2,517,000 of Montana's allocation is already committed to Butte-Silver Bow, Kalispell, Missoula (county), Polson, and Shelby by multi-year grants awarded by HUD in 1980 and 1981. Congress mandated that the states honor these multi-year grant commitments if they take over administration of the CDBG Program. The balance is available for state administration and grants to be awarded in the fall of 1982.

The Fiscal Year 1983 funding level is projected to be approximately the same as that allocated to Montana for 1982.

Within the requirements set out by the amended CDBG legislation and HUD regulations, the state has the authority to design its own procedures for program administration and to develop criteria or formulas for selection of grant recipients. The new law requires that the state's program for allocating CDBG funds:

> ...give maximum feasible priority to activities which will benefit low- and moderate-income families or aid in the prevention or elimination of slums or blight; the use of funds may also include activities which are designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community where other financial resources are not available to meet such needs.

The law also requires that the state provide, from state resources, an amount equal to 10 percent of the CDBG allocation for community development

activities. The 10 percent match must consist of state funds for community-related activities in non-metropolitan areas which will be spent in the same year as the CDBG funds. No special appropriation will be necessary to meet the 10 percent match requirement. The match can be met by any state operating appropriations, general obligation bonds, or revenue bonds being spent for community development purposes outside of Billings or Great Falls. For example, grants made to communities under the Coal Board Impact Program alone, will be sufficient to provide the state's match.

The state will be able to use two percent of the State CDBG allocation for administration of the program on the condition that it matches the two percent with state funds for administration, on a dollar for dollar basis.

Comment received from the public at the Block Grant Briefings held the week of September 21-25, 1981, was overwhelmingly supportive of state administration of the CDBG Program. The Montana League of Cities and Town and the Montana Association of Counties also both endorsed state take-over of the program. As a result, Governor Schwinden sought and received authorization from the November, 1981, special session of the Legislature to assume administration of the program.

C. The CDBG Task Force

In December, 1981, Gary Buchanan, Director of the Department of Commerce, appointed a 14-member Task Force to advise the Department in the development of Montana's CDBG Program.

The individuals appointed represented a balance between community development professionals who have worked with the CDBG Program under HUD administration and

other local officials who have not participated in the program previously. The members also reflected the range of Montana's community development issues and needs, from counties and small towns to large cities.

The Task Force met several times during January, February, and April to consider options for the State CDBG Program and to prepare recommendations to the Department for the design of the program. Members of the Task Force also participated with Commerce staff in six public meetings held across the state in March and April to solicit public reaction to the first draft of the State CDBG Program Description. This program description reflects the recommendations of the Task Force for the objectives of the State's program and the administrative framework to be used to allocate Community Development Block Grant funds to Montana communities.

II. PROGRAM DESCRIPTION

A. Program Objectives and General Policies

1. Goal

The goal of the Montana Community Development Block Grant Program is to develop viable communities by providing decent housing, healthful and safe living environments, and economic opportunities, principally for persons of low and moderate income.

For purposes of this program, "low and moderate income families" shall be defined as those families whose incomes do not exceed 80 percent of the median income of the families residing in non-metropolitan areas. (See Appendix A for definitions of "low and moderate income," by county.)

2. Objectives

a. Economic Development

Create increased economic opportunities for low and moderate income persons through:

(1) central business district revitalization,

(2) development of alternative energy or other community resources,

(3) expansion of existing businesses or creation of new businesses and industries,

(4) industrial site development and land assemblage,

(5) loans to encourage private participation in development projects, or

(6) improvements to public facilities necessary for business or industrial development.

b. Housing

Preserve and upgrade housing stock for low and moderate income persons through:

(1) rehabilitation of existing housing through loans, grants, or a combination thereof,

(2) demolition of substandard housing and relocation of residents,

(3) weatherization and energy efficiency measures,

(4) code enforcement activities, or

(5) land assemblage and site preparation for new construction.

c. Public Facilities

Support improvements to public facilities where needed to:

(1) improve the living environment of low and moderate income families,

(2) support housing and neighborhood revitalization,

(3) support economic development and increased employment opportunities,

(4) arrest or eliminate blight, or

(5) correct existing conditions which pose a serious and immediate threat to the health or welfare of the community.

B. Eligible Activities

The eligible activities which may be assisted under Montana's CDBG Program include only those set out by Congress in Title I of the Housing and Community Development Act of 1974, as amended and are limited to the following:

1. The acquisition of real property (including air rights, water rights, and other interests therein) which is:

a. blighted, deteriorated, deteriorating, undeveloped, or inappropriately developed from the standpoint of sound community development and growth;

b. appropriate for rehabilitation or conservation activities;

c. appropriate for the preservation or restoration of historic sites, the beautification of urban land, the conservation of open spaces, natural resources, and scenic areas, the provision of recreational opportunities, or the guidance of urban development;

d. to be used for the provision of public works, facilities, and improvements eligible for assistance under this program; or

e. to be used for other public purposes.

2. The acquisition, construction, reconstruction, or installation (including design features and improvements with respect to such construction, reconstruction, or installation which promote energy efficiency) of public works, facilities and site or other improvements -- including:

a. neighborhood facilities,
b. centers for the handicapped,
c. senior centers,
d. historic properties,
e. utilities (including power generation and distribution facilities using renewable resource energy systems),
f. streets,
g. street lights,
h. water and sewer facilities,
i. foundations and platforms for air rights sites,
j. pedestrian malls and walkways,
k. parks, playgrounds, and recreation facilities (including parks, playgrounds, and recreation facilities established as a result of reclamation and other construction activities carried out in connection with a river and land adjacent thereto where assistance under other Federal laws or programsis determined to be unavailable,
l. flood and drainage facilities in cases where assistance for such facilities under other Federal laws or programs is determined to be unavailable),
m. parking facilities,
n. solid waste disposal facilities,
o. recycling or conversion facilities, and
p. fire protection services and facilities which are located in or which serve designated community development areas.

3. Code enforcement in deteriorated or deteriorating areas in which such enforcement, together with public improvments and services to be provided, may be expected to arrest the decline of the area.

4. Clearance, demolition, removal, and rehabilitation (including rehabilitation which promotes energy efficiency) of buildings and improvements (including interim assistance, and financing public or private acquisition for rehabilitation, and rehabilitation of privately owned properties and including the renovation of

of closed school buildings).

5. Special projects directed to the removal of material and architectural barriers which restrict the mobility and accessibility of elderly and handicapped persons.

6. Payments to housing owners for losses of rental income incurred in holding for temporary periods housing units to be utilized for the relocation of individuals and families displaced by activities under this program.

7. Disposition (through sale, lease, donation, or otherwise) of any real property acquired pursuant to this program or its retention for public purposes.

8. Provision of public services, including but not limited to those concerned with employment, crime prevention, child care, health, drug abuse, education, energy conservation, welfare or recreation needs, if such services have not been provided by the unit of general local government (through funds raised by such unit, or received by such unit from the State) during any part of the twelve-month period immediately preceding the date of application and which are to be used for such services, unless the Department of Commerce finds that the discontinuation of such services was the result of events not within the control of the unit of general purpose local government, except that not more than 10 percent of the amount of any assistance to a unit of general purpose local government under this program may be used for activities under this paragraph.

9. Payment of the non-Federal share required in connection with a Federal grant-in-aid program undertaken as part of activities assisted under this program.

10. Payment of the cost of completing a project funded under Title I of the Housing Act of 1949.

11. Relocation payments and assistance for displaced individuals, families, businesses, organizations, and farm operations, when determined by the grantee to be appropriate.

12. Activities necessary:

a. to develop a comprehensive community development plan, and

b. to develop a policy-planning-management capacity so that the recipient of assistance under this program may more rationally and effectively:

(1) determine its needs,
(2) set long-term goals and short-term objectives,
(3) devise programs and activities to meet these goals and objectives,
(4) evaluate the progress of such programs in accomplishing these goals and objectives, and
(5) carry out management, coordination, and monitoring of activities necessary for effective planning implementation.

13. Payment of reasonable administrative costs and carrying charges related to the planning and execution of community development and housing activities, including the provision of information and resources to residents of areas in which

community development and housing activities are to be concentrated with respect to the planning and execution of such activities, and including the carrying out of activities as described in paragraph 12, above.

14. Activities which are carried out by public or private nonprofit entities, including:

a. acquisition of real property;

b. acquisition, construction, reconstruction, rehabilitation, or installation of:

(1) public facilities, site improvements, and utilities, and
(2) commercial or industrial building or structures and other commercial or industrial real property improvements; and

c. planning.

15. Grants to neighborhood-based nonprofit organizations, local development corporations, or entities organized under section 301(d) of the Small Business Investment Act of 1958 to carry out a neighborhood revitalization or community economic development or energy conservation project in furtherance of the goal of Montana's CDBG Program.

16. Activities necessary to the development of a comprehensive community-wide energy use strategy, which may include items such as:

a. a description of energy use and projected demand by sector, by fuel type, and by geographic area;

b. an analysis of the options available to the community to conserve scarce fuels and encourage use of renewable energy resources;

c. an analysis of the manner in, and the extent to, which the community's neighborhood revitalization, housing, and economic development strategies will support its energy conservation strategy;

d. an analysis of the manner in, and the extent to, which energy conservation objectives will be integrated into local government operations, purchasing and service delivery, capital improvements budgeting, land use planning and zoning, and traffic control, parking, and public transportation functions;

e. a statement of the actions the community will take to foster energy conservation and the use of renewable energy resources in the private sector, including the enactment and enforcement of local codes and ordinances to encourage or mandate energy conservation or use of renewable energy resources, financial and other assistance to be provided (principally for the benefit of low-and moderate-income persons) to make energy conserving improvements to residential structures, and any other proposed energy conservation activities;

f. appropriate provisions for energy emergencies;

g. identification of the local governmental unit responsible for administering the energy use strategy;

h. provision of a schedule for implementation of each element in the strategy; and

i. a projection of the savings in scarce fossil fuel consumption and the development and use of renewable energy resources that will result from implementation of the energy use strategy; and

17. provision of assistance to private for-profit entities, when the assistance is necessary or appropriate to carry out an economic development project.

C. Eligible Applicants

Eligible applicants are limited to counties, incorporated cities and towns and consolidated city-county governments. For projects proposed for unincorporated areas of a county, the county governing body is the eligible applicant. For projects proposed within a city or town, the city or town governing body is the eligible applicant; however, a county may apply for a project which will include activities within an incorporated city or town if the proposed activity is intended to significantly benefit county residents located in the unincorporated area of the county, as well as those within the city or town.

Billings and Great Falls are not eligible to apply and compete because they receive CDBG funds from a separate HUD allocation for communities with populations over 50,000. Montana's Indian tribes also receive CDBG funds from a separate HUD allocation and therefore are not eligible.

The former separate HUD allocation for applicants within metropolitan counties has been eliminated. Eligible applicants within Cascade and Yellowstone counties, as well as the counties themselves, will now compete for funds from the State CDBG program.

Special purpose bodies, such as local housing authorities or water districts are not eligible to apply directly, although they may be involved in implementing and administering a program if an eligible applicant agrees to such an arrangement.

When an eligible applicant does not feel that it has the capacity to manage a CDBG grant, it may arrange for grant administration by another local government through interlocal agreement or by contracting for administrative services.

D. Types of Grants Available

Applicants may submit only one application for either a single purpose or comprehensive grant per fiscal year, and the applicant should clearly indicate which type of grant it is choosing.

1. Single Purpose Grants

a. For a single purpose grant, a project must address a community development need in one of the following categories:

(1) Economic Development

(2) Housing

(3) Public Facilities

b. A project may consist of one activity or several activities designed to meet substantially a specific community development need. The major need must represent at least 80 percent of the funds requested. Other activities must be incidental to and in support of the principal activity.

c. Grants requested, either by themselves or in combination with other stated funding sources, must be sufficient to complete the proposed activities within a reasonable period of time, normally a year to 18 months.

d. The total amount of CDBG funds requested in the application must not exceed the ceiling established for single purpose grants. (See page 14 for ceiling amount.)

2. Comprehensive Grants

a. A comprehensive project must:

(1) Address community development needs in at least two of the following categories:

(a) Economic Development

(b) Housing

(c) Public Facilities

(2) Involve activities that bear a relationship to each other, (excluding administration, planning and management), and in terms of support or necessity, must be carried out in a coordinated manner;

(3) Address a substantial portion of the identified community development needs within a defined concentrated area or areas. The Department of Commerce may make an exception to this requirement if the applicant can demonstrate satisfactorily that the proposal is a reasonable means of addressing the identified needs, and

(4) Clearly be shown to have resulted from an overall assessment of community development needs.

b. There are two funding alternatives available for comprehensive grants: single year funding and multi-year funding.

(1) Single Year Comprehensive

A "single year comprehensive" is a project for which a single year funding commitment is requested. All the funds

needed to complete the project will be provided from a single year's appropriation. The project activities normally should be completed within a year to 18 months.

(2) Multi-year Comprehensive

A "multi-year comprehensive" is a project for which a funding commitment of up to a maximum of three years, is requested. Once a community has been approved for a multi-year commitment, it will not be required to compete for funds for the subsequent years of the state's commitment to the project. Funds will be provided in subsequent years, subject to appropriations, conditional upon the submittal of an acceptable work plan, and upon a determination that the previous year(s) project performance was adequate. The performance determination will be made at the time the subsequent year's proposal is submitted.

E. Distribution of Funds and Grant Ceilings

1. Funds Available

The amounts available for Montana's CDBG Program in fiscal year 1982 are approximately as follows:

Fiscal Year 1982

Total Fiscal Year 1982 state allocation	$6,109,000
Less 2% for state administration	122,000
	$5,987,000
Less commitments to multi-year comprehensive grants	2,517,000
Total available for distribution	$3,470,000

2. Distribution of Funds

35 percent of the Community Development Block Grant allocated to Montana for each fiscal year will be reserved for comprehensive grants. The balance of the funds will be utilized for single purpose grants.

Important Note: Because the amount of CDBG funds already committed to multi-year comprehensive grants for this fiscal year exceeds 35 percent, only single purpose grant applications will be accepted for the Fiscal Year 1982 State CDBG Program.

The distribution of these funds may be subject to a shift up or down, of not more than 10 percent, at the discretion of the Department of Commerce under the following circumstances:

a. if the funds remaining in the category for comprehensive projects are insufficient to fund the next highest ranked project or

b. where judgments on quality of proposed projects or their consistency with the statutory objectives of the CDBG program would justify redistribution of funds.

3. Grant Ceilings

a. Each type of grant will have a different grant ceiling, as follows:

Type	Ceiling
Single purpose	$ 400,000
Single year comprehensive	$ 750,00
Multi-year comprehensive	$ 500,000 per year for a maximum of three years

b. Amounts committed to multi-year comprehensive projects by the U.S. Department of Housing and Urban Development which are in excess of these grant ceilings will be honored by the State CDBG Program.

c. While grant ceilings establish the maximum amounts which may be requested, individual grants will be encouraged only in amounts commensurate with the scope of the identified problem(s), the proposed project and the administrative capacity of the community.

d. There are no minimum amounts required for grant requests.

III. POLICIES AND PROCEDURES FOR APPLICATION

A. General Policies and Requirements for All Applicants

1. Additional Funding Sources

Applicants are encouraged to develop projects that will include participation of non-CDBG funding sources.

2. Job Creation

Applicants are encouraged to develop projects that will foster employment opportunities for low and moderate income persons.

3. One Application Permitted

Applicants may submit only one application per federal fiscal year (October 1 through September 30).

4. Re-application

For the Fiscal Year 1982 CDBG Program, current grantees (single purpose and comprehensive) are not eligible to reapply until at least 75 percent of their total grant amount has been drawn from the applicant's CDBG account or until all project activities have been completed. Grantees with uncompleted projects must provide a schedule for completing the existing project. This requirement may be waived only in the event that an applicant can document the existence of unusual, extenuating circumstances.

5. Capacity and Performance

To be awarded a grant under the CDBG Program, applicants must have the capacity to undertake and complete the project they are proposing.

a. Based upon evidence in the application and unless generally available facts raise a question concerning an applicant's capacity, applicants are assumed to have the capacity to undertake their proposed programs. If there is any question, the Department of Commerce may request additional information.

b. Applicants that have previously received a Community Development Block Grant must have performed adequately. In assessing performance, the Department will consider whether the grant funds were expended in a timely and effective manner for the purposes originally proposed and whether the program was administered in conformance with applicable laws, regulations and guidelines. Performance judgments will be made on a case-by-case basis.

6. Citizen Participation

Applicants must provide citizens with adequate opportunities for meaningful involvement in the development of the application. At a minimum, the applicant must hold at least one public hearing before preparing the application and one prior to submission. The hearings should be held so as to obtain the views and proposals of citizens, especially low and moderate income persons, regarding community development needs and priorities. The applicant must furnish citizens general information regarding the State Community Development Block Grant Program.

7. Community Development Needs Assessment

Applicants must prepare an assessment of overall community development needs and propose a strategy for responding to them. The needs assessment must:

a. Identify community needs;

b. Establish priorities for the identified needs, and

c. Describe how the community proposes to respond to its most critical needs, including all local efforts undertaken.

A summary of the needs assessment shall be submitted as a part of the application. The summary must include a description of the process used to identify and select the needs and priorities, including efforts to encourage citizen participation.

8. Project Justification

Applicants must justify the selection of the proposed project in relation to the community needs assessment and show how the activities offer solutions which could not be accomplished without CDBG assistance.

9. Budget

Applicants must provide a detailed budget of specific proposed CDBG project activities and related administrative costs, including a breakdown of total project costs to identify sources and amounts of all non-CDBG funds to be used. In no case may the administrative budget to be reimbursed by the grant exceed 18 percent of the total grant requested. The administrative budget covers the costs of implementing a local project, including costs involved in preparing the environmental review; planning, and design fees; the cost of the local program audit; and other contractual costs for professional services that are associated with administration of the program.

Costs incurred prior to award of the grant are not eligible for reimbursement, such as application preparation fees, costs associated with conducting

a local survey, and preliminary engineering studies.

10. Project Income

If project income will be generated (through loan repayments, for example), applicants must include a plan with a description of the financial mechanism for using project income for further eligible activities.

11. Conditional Approval of Grant Award

Projects which are dependent on funds or resources other than a Community Development Block Grant will be permitted 90 days after the date of grant award to complete all necessary arrangements. The Department of Commerce will extend this period only in the event that the applicant can document the existence of unusual, extenuating circumstances.

12. Assurances

Applicants must provide assurances that they will comply with the requirements set out in Appendix B.

B. Special Requirements for Project Categories

The activities under a local project will fall into one or more of the three project categories: economic development, housing, or public facilities. The following sections set out the special requirements applicable for each.

1. Economic Development

a. Private Sector Commitments

Applicants must include evidence of firm commitments of resources from the private sector. Such commitments should be contingent only upon receipt of block grant funds.

b. Public Sector Commitments

Applicants must demonstrate evidence of firm commitment of public funds and/or other resources. Such commitments should be contingent only upon receipt of block grant funds to the project. Evidence shall include resolutions or ordinances passed by the local governing body and other appropriate local groups.

c. Hiring Plan

Applicants must establish and describe practices to be followed to ensure preferential hiring of low and moderate income people. Examples are:

(1) listing with the local Job Service;

(2) contacting local groups serving low and moderate income people;

(3) recruiting in the neighborhood of the project;

(4) including preferential hiring clauses in contracts with subcontractors; and

(5) utilizing apprenticeship programs.

d. Local Development Corporations (LDC's)

CDBG funds cannot be used for organizational start-up costs for an LDC. Local revolving loans established by the CDBG grant, however, may be administered by an established LDC.

e. Pirating of Businesses

Generally, proposals that would encourage relocation of a business from one Montana community to another will be disqualified.

2. Housing

For projects proposing housing rehabilitation activities under a grant, or loan program, applicants will be required to adopt and enforce suitable housing rehabilitation and state-adopted building standards for the project area, including energy conservation requirements.

3. Public Facilities

Grant proposals intended to address deficiencies in public facilities must indicate whether the focus of the project will be to:

a. benefit low to moderate income families; or

b. aid in the prevention of slums or blight; or

c. respond to community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community. In such cases the applicant must provide:

(1) verification by a public agency, other than the applicant (a state agency, if possible) that existing conditions pose a serious and immediate threat to the health or welfare of the community; and

(2) evidence that other financial resources are not available to meet the identified urgent need; or

d. a combination of the above.

IV. RANKING APPLICATIONS

A. General Information

1. Single purpose grant applications compete against other single purpose applications. The applications are ranked according to the criteria established for their appropriate project category.

2. Comprehensive applications compete against other comprehensive applications. Comprehensive applications are ranked according to the criteria established for the project categories included in the application and receive points proprotionately, according to the percentage of funding sought for each project category.

3. Applications can receive a maximum of 1000 points, earned through two systems: project impact and local government status. The scores from these two systems will be combined, with project impact weighted with 900 points and local government status with 100 points. Applicants with the highest overall scores will receive grant awards, with the actual number of awards subject to funding availability and the amount of each applicant's request.

B. Project Impact System

Under the Project Impact System, each of the three project categories has its own subsystem which is used to rank projects falling under that category. Project impact rankings will be determined using information submitted by the applicant. This information must be specific to the defined geographic area of the proposal.

The Ranking Committee will assess the degree to which a proposed project responds to each of the five criteria in its category by rating it high, medium or low. Points will be credited for the high, medium and low ratings at the values given within the following subsystem descriptions. The point weighting for each criteria have been set according to the recommendations of the CDBG Task Force.

The criteria for the three project categories and their point weightings are described separately as follows:

1. Economic Development Subsystem - 900 points maximum

The economic development subsystem includes the following five criteria:

a. Benefit to Low and Moderate Income assesses benefit by means of the percentage of permanent jobs created or retained for low and moderate income persons relative to the total number of jobs created by the project; the higher the percentage, the more substantial the benefit. For example, a project which creates 10 jobs for low and moderate income people out of 20 total jobs yields a 50 percent benefit.

Points:	High	220
	Medium	110
	Low	0

b. Leverage is the percentage of total non-CDBG dollars from public and private sources relative to the total CDBG dollars requested; the higher the percentage, the more substantial the leverage. For example, a project with a total cost of $1,000,000, of which $500,000 is from non-CDBG funding sources and $500,000

is CDBG funding, would have a 100 percent leverage.

Points:	High	193
	Medium	113
	Low	23

c. Completeness and Appropriateness of the solution considers:

1) the adequacy of the applicant's strategy for meeting its identified economic development needs;

2) whether the proposed CDBG project is an integral part of that strategy;

3) whether the project can be completely accomplished with the addition of the requested CDBG funds to existing public and private resources; and

4) whether the anticipated job creation/saving will occur within a reasonable period of time following project completion.

Points:	High	180
	Medium	116
	Low	33

d. Dollars per job is a ratio of the total CDBG dollars requested relative to the total number of permanent jobs created or retained; the lower the ratio, the more reasonable the cost. For example, a $500,000 project creating 100 jobs would yield a cost ratio of $5,000 per job.

Points:	High	155
	Medium	116
	Low	58

e. Project Income assesses dollars returned to the local project over time as a percentage of total CDBG dollars requested. Loan repayments, interest and principal payments in revolving accounts, leaseback arrangements, or property sales would generate program income, as opposed to direct grants; the higher the percentage, the more substantial the program income. For example, $100,000 in program income generated from a $400,000 CDBG program yields a 25 percent return.

Points:	High	152
	Medium	113
	Low	63

2. Housing Subsystem - 900 points maximum

The housing subsystem includes the following five criteria:

a. Substandard Housing is the percentage of substandard housing units in the project area relative to the total number of housing units. The percentage is based on local surveys of substandard housing conditions. Applicants should use as a guideline the definition of "sub-standard" contained in the latest authorized edition of the Uniform Housing Code.

Points:	High	193
	Medium	110
	Low	18

b. Low and Moderate Income Households is the percentage of low and moderate income households in the project area relative to the total number of households in the project area. It is based on local surveys and other evidence of low and moderate income households.

Points:	High	190
	Medium	110
	Low	21

c. Benefit to Low and Moderate Income is the percentage of low and moderate income persons the project will benefit relative to the total number of persons the project will benefit. It is based on local surveys and other evidence of low and moderate income persons.

Points:		
	High	193
	Medium	110
	Low	0

d. Targeting and Impact considers:

1) the adequacy of the applicant's strategy for meeting its identified housing needs;

2) the degree to which the proposed CDBG project is an integral part of that strategy;

3) the strength of the applicant's rationale for selecting the particular project area to be served; and

4) the appropriateness of the project design, taking into account the needs of the persons to be served, the availability of other public or private resources, and the occupancy characteristics (owner or renter) of the units being addressed.

Points:		
	High	153
	Medium	101
	Low	49

e. Energy Conservation evaluates the applicant's commitment to reducing home energy costs. The applicant must provide a plan of the efforts to be undertaken with CDBG funds to achieve significant reductions in household energy consumption.

Points:	High	171
	Medium	107
	Low	24

3. Public Facilities Subsystem - 900 points maximum

The Public Facilities Subsystem includes the following five criteria:

a. Severity and Immediacy of Threat assesses the adequacy of public facilities by using existing criteria of other appropriate public or private agencies, whenever possible. When necessary, the Department of Commerce will seek technical review by appropriate agencies to evaluate proposals in terms of the severity of the threat to the public health and welfare. This criterion would also include a consideration of the immediacy of the threat. An immediate problem would rank higher than a potential problem.

Points:	High	214
	Medium	107
	Low	0

b. Benefit and Low to Moderate Income is the percentage of low and moderate income persons the project will benefit relative to the total number of persons the project will benefit.

Points:	High	201
	Medium	107
	Low	13

c. Community Efforts assesses capability of the applicant to respond to the identified problem. The applicant must document past local efforts to prevent or resolve the problem, in relation to the following:

- attempts to obtain alternative or additional funding for the project;
- local government financial constraints; including maximum millage, outstanding indebtedness, and bonding capacity;
- if applicable to the project, the existing or proposed rate structure for the service and past efforts to increase rates to respond to the problem; and
- capital improvements programming and preventative maintenance.

Points:	High	185
	Medium	107
	Low	29

This criterion will also consider the proposed efforts of the applicant to assist in financing the project, in relation to its financial capability.

d. Completeness and Appropriateness of the Solution considers the degree to which the project appropriately addresses the problem and provides a long-term solution. A project that would inappropriately or only partially respond to a problem would rank lower.

Points:	High	158
	Medium	108
	Low	54

e. Ability to Maintain evaluates the degree to which the applicant has clearly documented that it is both technically and financially capable of maintaining the proposed project over the long term.

Points:	High	142
	Medium	105
	Low	74

C. Local Government Status System - 100 points maximum

The local government status system measures each applicant's relative distress and financial capability, based on four criteria. Each eligible applicant has been scored high, medium or low according to the criteria being used, relative to all other eligible applicants in the state. The status of each eligible applicant was computed by the Montana Department of Commerce from data generally available for local governments. The Department will annually update and publish a list showing the relative scores for each eligible applicant. The scores for this year's grant competition are listed in Appendix C. The relative weights for the points under each criteria were assigned by the CDBG Task Force and are listed with the following four criteria:

1. Housing Inadequacy is measured by percentage of houses without plumbing and with crowded conditions, using 1980 Census data. Local governments with higher indices of housing inadequacy receive higher scores.

Points:	High	27
	Medium	15
	Low	1

2. Employment Conditions weighs equally employment growth data from the U.S. Department of Commerce, Bureau of Economic Analysis Regional Economic Information System (REIS) and unemployment data from the Montana Department of Labor and Industry, from 1975 to 1980. Local governments with more severe employment conditions receive higher scores.

Points:	High	24
	Medium	15
	Low	0

3. Local Efforts to address community development needs are measured by the applicant's level of expenditures relative to its taxable value, using data from annual financial reports for cities, towns and counties filed with the Montana Department of Administration for the years 1977 to 1980. Local governments with higher levels of expenditure relative to taxable value receive higher scores.

Points:	High	23
	Medium	15
	Low	5

4. Per Capita Income is measured by REIS data for the years 1974 to 1979. Local governments with lower per capita income levels receive higher scores.

Points:	High	26
	Medium	14
	Low	2

D. Ranking Process

1. A five-member Ranking Committee will be appointed by the Director of the Department of Commerce. The committee will be chaired by a representative of the Department who is familiar with the State CDBG program but who has not been involved in the direct provision of technical assistance to individual applicants. Four other individuals will be selected based on their broad knowledge and experience in housing, public administration, economic or community development, or in grant and program management.

2. Upon submission, Department of Commerce staff will review each application for completeness and for conformance to program regulations and guidelines. The staff may request additional information during the review period. Information submitted after the deadline will not be considered unless it has been requested by staff.

3. Applications will be divided into project categories for review.

4. Members of the Ranking Committee will assign points to each application according to the two ranking systems:

a. project impact, and

b. local government status.

5. The Ranking Committee as a whole will determine final rankings.

6. Based on the ranking order, the committee will recommend projects to be funded. The Ranking Committee may recommend conditional funding when adjustments regarding individual activities are warranted. Examples of such circumstances are:

a. When an activity schedule proposes an implementation time frame which may be unrealistic, e.g., modifying a proposed single year comprehensive project to a multi-year;

b. When an activity represents an extremely expensive solution to a community problem; or

c. When an activity fails to demonstrate a significant measurable impact on an identified need within a reasonable time period.

7. Ranking Committee recommendations will be forwarded to the Director of the Department of Commerce who will make the final grant awards.

E. Applicant Appeal

1. An applicant that is not selected for funding has ten days after receipt of notification to submit, in writing, a request for review of its application.

2. The Department must respond to requests for review within ten days.

3. Appeals will be granted only on the basis of miscalculation of the index for local government status. This index contributes less than 10% of the point value to the final score.

4. Department of Commerce staff will review applications with applicants on request to discuss specific points in their applications.

APPENDIX A

For the purposes of Montana's Community Development Block Grant Program (CDBG), "low to moderate income families" has been defined as those families whose incomes do not exceed 80% of the median income for all families in the area (county). A "family" may include households having only one individual. Since the same income definition is used for the U.S. Department of Housing and Urban Development "Section 8" Moderate Rehabilitation Program, Montana's CDBG program will utilize the income limits published for that program. The following are the current income guidelines, by county.

HOUSEHOLD INCOME LIMITS

	1-PERSON	2-PERSON	3-PERSON	4-PERSON	5-PERSON	6-PERSON	7-PERSON	8-PERSON OR MORE
BEAVERHEAD COUNTY	11300	12900	14550	16150	17150	18150	19200	20200
BIG HORN COUNTY	10450	11900	13400	14900	15850	16750	17700	18650
BLAINE COUNTY	10450	11900	13400	14900	15850	16750	17700	18650
BROADWATER COUNTY	10450	11900	13400	14900	15850	16750	17700	18650
CARBON COUNTY	10450	11900	13400	14900	15850	16750	17700	18650
CARTER COUNTY	11750	13450	15100	16800	17850	18900	19950	21000
CASCADE COUNTY	12100	13850	15550	17300	18400	19450	20550	21650
CHOUTEAU COUNTY	11950	13650	15350	17050	18100	19200	20250	21300
CUSTER COUNTY	11500	13100	14750	16400	17450	18450	19500	20500
DANIELS COUNTY	11500	13200	14850	16500	17550	18550	19600	20650
DAWSON COUNTY	12500	14300	16050	17850	18950	20100	21200	22300
DEER LODGE COUNTY	11850	13500	15200	16900	17950	19000	20050	21150
FALLON COUNTY	12150	13900	15600	17350	18450	19500	20600	21700
FERGUS COUNTY	11400	13000	14600	16250	17250	18300	19300	20300
FLATHEAD COUNTY	12200	13950	15700	17450	18550	19650	20700	21800
GALLATIN COUNTY	12100	13850	15550	17300	18400	19450	20550	21650
GARFIELD COUNTY	10450	11900	13400	14900	15850	16750	17700	18650

	1-PERSON	2-PERSON	3-PERSON	4-PERSON	5-PERSON	6-PERSON	7-PERSON	8-PERSON OR MORE
GLACIER COUNTY	10450	11950	13450	14950	15900	16800	17750	18700
GOLDEN VALLEY COUNTY	10450	11900	13400	14900	15850	16750	17700	18650
GRANITE COUNTY	10450	11900	13400	14900	15850	16750	17700	18650
HILL COUNTY	12200	13950	15700	17450	18550	19650	20700	21800
JEFFERSON COUNTY	11650	13300	15000	16650	17700	18750	19750	20800
JUDITH BASIN COUNTY	10450	11900	13400	14900	15850	16750	17700	18650
LAKE COUNTY	10450	11900	13400	14900	15850	16750	17700	18650
LEWIS & CLARK COUNTY	13600	15500	17450	19400	20600	21850	23050	24250
LIBERTY COUNTY	11750	13450	15100	16800	17850	18900	19950	21000
LINCOLN COUNTY	13600	15500	17450	19400	20600	21850	23050	24250
MCCONE COUNTY	11400	13050	14650	16300	17300	18350	19350	20400
MADISON COUNTY	10450	11900	13400	14900	15850	16750	17700	18650
MEAGHER COUNTY	10450	11900	13400	14900	15850	16750	17700	18650
MINERAL COUNTY	12100	13850	15550	17300	18400	19450	20550	21650
MISSOULA COUNTY	12950	14800	16650	18500	19650	20800	21950	23150
MUSSELSHELL COUNTY	10450	11900	13400	14900	15850	16750	17700	18650
PARK COUNTY	10450	11950	13450	14950	15900	16800	17750	18700

	1-PERSON	2-PERSON	3-PERSON	4-PERSON	5-PERSON	6-PERSON	7-PERSON	8-PERSON OR MORE
PETROLEUM COUNTY	10450	11900	13400	14900	15850	16750	17700	18650
PHILLIPS COUNTY	10450	11900	13400	14900	15850	16750	17700	18650
PONDERA COUNTY	10550	12050	13550	15050	16000	16950	17850	18800
POWDER RIVER COUNTY	10900	12500	14050	15600	16600	17550	18550	19500
POWELL COUNTY	12050	13750	15500	17200	18300	19350	20450	21500
PRAIRIE COUNTY	10450	11900	13400	14900	15850	16750	17700	18650
RAVALLI COUNTY	10450	11900	13400	14900	15850	16750	17700	18650
RICHLAND COUNTY	11550	13200	14850	16500	17750	18550	19600	20650
ROOSEVELT COUNTY	11850	13500	15200	16900	17950	19000	20050	21150
ROSEBUD COUNTY	10450	11900	13400	14900	15850	16750	17700	18650
SANDERS COUNTY	11200	12800	14400	16000	17000	18000	19000	20000
SHERIDAN COUNTY	12800	14600	16400	18250	19400	20550	21650	22800
SILVER BOW COUNTY	12400	14150	15950	17700	18800	19900	21000	22150
STILLWATER COUNTY	10450	11900	13400	14900	15850	16750	17700	18650
SWEET GRASS COUNTY	10450	11900	13400	14900	15850	16750	17700	18650
TETON COUNTY	11250	12900	14500	16100	17100	18100	19100	20150
TOOLE COUNTY	11650	13300	15000	16650	17700	18750	19750	20800

	1-PERSON	2-PERSON	3-PERSON	4-PERSON	5-PERSON	6-PERSON	7-PERSON	8-PERSON OR MORE
TREASURE COUNTY	10450	11900	13400	14900	15850	16750	17700	18650
VALLEY COUNTY	11200	12800	14400	16000	17000	18000	19000	20000
WHEATLAND COUNTY	10450	11900	13400	14900	15850	16750	17700	18650
WIBAUX COUNTY	10800	12350	13900	15450	16400	17400	18350	19300
YELLOWSTONE COUNTY	12900	14700	16550	18400	19550	20700	21850	23000

Montana Community Development Block Grant Program

STATEMENT OF ASSURANCES

The applicant hereby assures and certifies that:

(a) It possesses legal authority to apply for the grant, and to execute the proposed program.

(b) Its governing body has duly adopted or passed as an official act a resolution, motion or similar action authorizing the filing of the application, including all understandings and assurances contained therein, and directing and authorizing the applicant's chief executive officer to act in connection with the application and to provide such additional information as may be required.

(c) It has facilitated or will facilitate citizen participation by:

(1) Providing citizens with an opportunity for meaningful involvement in the development of the application;
(2) Providing adequate notices for two or more public hearings;
(3) Holding, at a minimum:
- one public hearing before preparing the application to obtain views of citizens regarding community development priorities

and

- one public hearing before submission of the application to explain the proposed project

(4) Providing for citizen participation when considering amendments to the community development program; and
(5) Providing for citizen participation in the implementation and assessment of the community development program.

(d) Its chief executive officer or other officer of applicant approved by the State:

(1) Consents to assume the status of responsible Federal official under the National Environmental Policy Act of 1969 (NEPA) and other provisions of Federal law, as specified in 24 CFR Part 58, which further the purposes of NEPA, insofar as the provisions of such Federal law apply to the Montana Community Development Block Grant Program;
(2) Is authorized and consents on behalf of the applicant and himself to accept the jurisdiction of the Federal courts for the purpose of enforcement of his reponsibilities as such an official.

(e) It will comply with the regulations, policies, guidelines and requirements of OMB Circulars Number A-87 and A-102, Revised, as specified by the state, which relate to the application, acceptance and use of Federal funds.

(f) It will comply with:

(1) Section 110 of the Housing and Community Development Act of 1975, as amended, 24 CFR 570.605, and State regulations regarding the administration and enforcement of labor standards;

(2) The provisions of the Davis-Bacon Act (46 U.S.C.S 276a) with respect to prevailing wage rates (except for projects for the rehabilitation of residential properties of fewer than eight units);
(3) Contract Work Hours and Safety Standards Act of 1962, 40 U.S.C. 327-332, requiring that mechanics and laborers employed on federally assisted contracts be paid wages of not less than one and one-half times their basic wage rates for all hours worked in access of eight in a calendar day or, forty in a work-week, whichever is greater; and
(4) Federal Fair Labor Standards Act, 29 U.S.C. S 201 et seq, requiring that covered employees be paid at least the minimum prescribed wage, and also that they be paid one and one-half times their basic wage rate for all hours worked in excess of the prescribed work-week.

(g) It will comply with all requirements imposed by the State concerning special requirements of law, program requirements, and other administrative requirements.

(h) It will comply with:

(1) Title VI of the Civil Rights Act of 1964 (Pub.L.88-352), and the regulations issued pursuant thereto (24 CFR Part 1), which provides that no person in the United States shall on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which the applicant receives Federal financial assistance and will immediately take any measures necessary to effectuate this assurance. If any real property or structure thereon is provided or improved with the aid of Federal financial assistance extended to the applicant, this assurance shall obligate the applicant, or in the case of any transfer of such property, any transferee, for the period during which the real property or structure is used for a purpose for which the Federal financial assistance is extended, or for another purpose involving the provision of similar services or benefits;
(2) Title VIII of the Civils Rights Act of 1968 (Pub. L. 90-284), as amended, administering all programs and activities relating to housing and community development in a manner to affirmatively further fair housing; and will take action to affirmatively further fair housing in the sale or rental of housing, the financing of housing, and the provision of brokerage services;
(3) E.O. 12259, Leadership and Coordination of Fair Housing in Federal Programs, requiring that programs and activities relating to housing and urban development be administered in a manner affirmatively to further the goals of Title VIII of the Civil Rights Act of 1968;
(4) Section 109 of the Housing and Community Development Act of 1974 (ACT), as amended, and the regulations issued pursuant thereto (24 CFR 570.601), which provides that no person in the United States shall, on the grounds of race, color, national origin, or sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under, any program or activity funded in whole or in part with funds provided under the Act. Any prohibition against discrimination on the basis of age under the Age Discrimination Act of 1975 or with respect to otherwise qualified handicapped individuals as provided in Section 504 of the Rehabilitation Act of 1973 shall also apply to any such program activity;

(5) Executive Order 11063 on equal opportunity in housing and nondiscrimination in the sale or rental of housing built with Federal assistance; and
(6) Executive Order 11246 as amended by Executive Orders 11375 and 12086, and the regulations issued pursuant thereto (24 CFR Part 130 and 41 CFR Chapter 60), which provide that no person shall be discriminated against on the basis of race, color, religion, sex or national origin in all phases of employment during the performance of federal or federally assisted construction contracts. Contractors and subcontractors on Federal and federally assisted construction contracts shall take affirmative action to insure fair treatment in employment, upgrading, demotion, or transfer; recruitment or recruitment advertising; layoff or termination, rates of pay or other forms of compensation and selection for training and apprenticeship.

(i) It will comply with Section 3 of the Housing and Urban Development Act of 1968, as amended, requiring that to the greatest extent feasible opportunities for training and employment be given to lower-income persons residing within the unit of local government in which the project is located; and that contracts for work in connection with the project be awarded to eligible business concerns which are located in, or owned in substantial part by, persons residing within the unit of local government.

(j) It will:

(1) Comply with Title II (Uniform Relocation Assistance) of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and HUD implementing regulations at 24 CFR Part 42 and 24 CFR 570.602(a);
(2) Provide relocation payments and offer relocation assistance as described in Section 205 of the Uniform Relocation Assistance Act to all persons displaced as a result of acquisition of real property for an activity assisted under the Community Development Block Grant program. Such payments and assistance shall be provided in a fair and consistent and equitable manner that insures that the relocation process does not result in different or separate treatment of such persons on account of race, color, religion, national origin, sex, or source of income;
(3) Assure that, within a reasonable period of time prior to displacement, comparable decent, safe and sanitary replacement dwellings will be available to all displaced families and individuals and that the range of choices available to such persons will not vary on account of their race, color, religion, national origin, sex, or source of income; and
(4) Inform affected persons of the relocation assistance, policies and procedures set forth in the regulations at 24 CFR Part 42 and 24 CFR 570.602(a).

(k) It will:

(1) To the greatest extent practicable under State law, comply with Sections 301 and 302 of Title III (Uniform Real Property Acquisition Policy) of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and will comply with Section 303 and 304 of Title III, and HUD implementing instructions at 24 CFR Part 42; and
(2) Inform affected persons of their rights and of the acquisition policies and procedures set forth in the regulations at 24 CFR Part 42 CFR 570.602(b).

(l) It will establish safeguards to prohibit employees from using positions for a purpose that is or gives the appearance of being motivated by a desire for private gain for themselves or others, particularly those with whom they have family, business, or other ties.

(m) It will comply with the Anti-kickback (Copeland)Act of 1934, 18 U.S.C. S 874 and 40 U.S.C. S 276a, which outlaws and prescribes penalties for "kickbacks" of wages in federally financed or assisted construction activities.

(n) It will comply with the provisions of Executive Order 11296, relating to evaluation of flood hazards and Executive Order 11288 relating to the prevention, control, and abatement of water pollution.

(o) It will give the State, HUD and the Comptroller General, through any authorized representatives, access to and the right to examine all records, books, papers, or documents related to the grant.

(p) It will insure that the facilities under its ownership, lease or supervision which shall be utilized in the accomplishment of the program are not listed on the Environmental Protection Agency's (EPA) list of Violating Facilities and that it will notify the State of the receipt of any communication from the Director of the EPA Office of Federal Activities indicating that a facility to be used in the project is under consideration for listing by the EPA.

(q) It will comply with the flood insurance purchase requirement of Section 102(a) of the Flood Disaster Protection Act of 1973, Publ L. 93-234, 87 Stat. 975, approved December 31, 1973. Section 102(a) required, on and after March 2, 1974, the purchase of flood insurance in communities where such insurance is available as a condition for the receipt of any Federal financial assistance for construction or acquisition purposes for use in any area that has been identified by the Secretary of the Department of Housing and Urban Development as an area having special flood hazards. The phrase "Federal financial assistance" include any form of loan, grant, guaranty, insurance payment, rebate, subsidy, disaster assistance loan or grant, or any other form of direct or indirect Federal assistance.

(r) It will, in connection with its performance of environmental assessments under the National Environmental Policy Act of 1969, comply with Section 106 of the National Historic Preservation Act of 1966 (16 U.S.C. 470), Executive Order 11593, and the Preservation of Archeological and Historical Data Act of 1966 (16 U.S.C. 469a-1, et. seq.) by:

(1) Consulting with the State Historic Preservation Officer to identify properties listed in or eligible for inclusion in the National Register of Historic Places that are subject to adverse effects (see 36 CFR Part 800.8) by the proposed activity; and
(2) Complying with all requirements established by the State to avoid or mitigate adverse effects upon such properties.

(s) It will comply with:

(1) The National Environmental Policy Act of 1969 (42 U.S.C. Sect 4321 et seq.) and 24 CFR Part 58;
(2) Executive Order 11988, Floodplain Management;
(3) Executive Order 11990, Protection of Wetlands;

(4) The Endangered Species Act of 1973, as amended (16 U.S.C.s 1531 et seq.);
(5) The Fish and Wildlife Coordination Act of 1958, as amended, (16 U.S.C.S. 661 et seq.);
(6) The Wild and Scenic Rivers Act of 1968, as amended, (16 U.S.C.S. 1271);
(7) The Safe Drinking Water Act of 1974, as amended (42 U.S.C. 200F et. seq.);
(8) Section 401(f) of the Lead-Based Paint Poisoning Prevention Act, as amended (42 U.S.C.S. 4831(b));
(9) The Clean Air Act of 1970, as amended (42 U.S.C.S. 7401 et seq.);
(10) The Federal Water Pollution Control Act of 1972, as amended, (33 U.S.C. 1251 et seq.);
(11) The Clean Water Act of 1977 (Public Law 95-217); and
(12) The Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act of 1976 (42 U.S.C.S. 6901 et seq.);
(13) Subpart B on Noise Abatement and Control to Part 51 of Title 24.

(t) It will require every building or facility (other than a privately owned residential structure) designed, constructed, or altered with funds provided under this Part to comply with the "American Standard Specifications for Making Buildings and Facilities Accessible to, and Usable by, the Physically Handicapped," Number A-117.1-R 1971, subject to the exceptions contained in-spections to insure compliance with these specifications by the contractor.

(u) It will comply with all parts of Title I of the Housing and Community Development Act of 1974, as amended, which have not been cited previously as well as with other applicable laws.

(v) It will comply with Cost-Effective Energy Standards, 24 CFR Part 39.

The applicant hereby certifies that it will comply with the above stated assurances.

_____
Signature, Chief Executive Officer

_____
Name (typed or printed)

_____
Title

_____
Date

APPENDIX C

Local Government Status Scores for Local Governments

Eligible for the Montana CDBG Program

Local Government	Housing Inadequacy Score	Employment Conditions Score	Local Efforts Score	Per Capita Income Score	Composite Score
BEAVERHEAD COUNTY	27	15	15	14	71
DILLON	27	15	23	14	79
LIMA	1	15	5	14	35
BIGHORN COUNTY	27	0	5	14	46
LODGE GRASS	15	0	23	14	52
HARDIN	15	0	23	14	52
BLAINE COUNTY	27	24	5	14	70
CHINOOK	27	24	23	14	88
HARLEM	15	24	23	14	76
BROADWATER COUNTY	27	0	23	14	64
TOWNSEND	1	0	5	14	20
CARBON COUNTY	27	15	15	14	71
BRIDGER	1	15	15	14	45
FROMBERG	1	15	15	14	45
JOLIET	1	15	23	14	53
BEARCREEK	27	15	15	14	71
RED LODGE	27	15	5	14	61
CARTER COUNTY	27	24	23	14	88
EKALAKA	15	24	5	14	58
CASCADE COUNTY	15	24	23	2	64
BELT	1	24	23	2	50
CASCADE	1	24	15	2	42
NEIHART	27	24	5	2	58
CHOUTEAU COUNTY	15	15	5	2	37
BIG SANDY	15	15	5	2	37
FORT BENTON	15	15	23	2	55
GERALDINE	1	15	15	2	33
CUSTER COUNTY	27	0	23	2	52
MILES CITY	27	0	23	2	52
ISMAY	1	0	5	2	8
DANIELS COUNTY	27	0	5	2	34
FLAXVILLE	15	0	5	2	22
SCOBEY	27	0	23	2	52

Local Government	Housing Inadequacy Score	Employment Conditions Score	Local Efforts Score	Per Capita Income Score	Composite Score
DAWSON COUNTY	15	0	15	14	44
RICHEY	15	0	5	14	34
GLENDIVE	15	0	15	14	44
DEER LODGE COUNTY	1	24	23	14	62
ANACONDA	1	24	15	14	54
FALLON COUNTY	15	0	5	14	34
BAKER	1	0	23	14	38
PLEVNA	1	0	5	14	20
FERGUS COUNTY	27	15	23	14	79
DENTON	1	15	5	14	35
GRASS RANGE	1	15	5	14	35
LEWISTOWN	27	15	23	14	79
MOORE	1	15	5	14	35
WINIFRED	27	15	5	14	61
FLATHEAD COUNTY	27	0	23	2	52
COLUMBIA FALLS	1	0	15	2	18
KALISPELL	15	0	15	2	32
WHITEFISH	15	0	23	2	40
GALLATIN COUNTY	15	15	23	14	67
BELGRADE	1	15	23	14	53
BOZEMAN	15	15	15	14	59
MANHATTAN	15	15	15	14	59
THREE FORKS	1	15	23	14	53
WEST YELLOWSTONE	1	15	5	14	35
GARFIELD COUNTY	27	15	23	14	79
JORDAN	15	15	5	14	49
GLACIER COUNTY	27	15	5	2	49
BROWNING	27	15	23	2	67
CUT BANK	15	15	23	2	55
GOLDEN VALLEY COUNTY	27	24	5	2	58
LAVINA	27	24	5	2	58
RYEGATE	1	24	5	2	32
GRANITE COUNTY	15	24	23	14	76
DRUMMOND	1	24	5	14	44
PHILIPSBURG	1	24	23	14	62
HILL COUNTY	15	15	15	2	47
HINGHAM	1	15	5	2	23
HAVRE	15	15	15	2	47

Local Government	Housing Inadequacy Score	Employment Conditions Score	Local Efforts Score	Per Capita Income Score	Composite Score
JEFFERSON COUNTY	27	24	15	2	68
BOULDER	15	24	23	2	64
WHITEHALL	15	24	15	2	56
JUDITH BASIN COUNTY	27	24	15	14	80
HOBSON	1	24	5	14	44
STANFORD	15	24	15	14	68
LAKE COUNTY	15	15	15	14	59
POLSON	1	15	23	14	53
RONAN	15	15	15	14	59
ST. IGNATIUS	1	15	15	14	45
LEWIS AND CLARK COUNTY	15	0	15	2	32
EAST HELENA	15	0	5	2	22
HELENA	15	0	23	2	40
LIBERTY COUNTY	27	0	15	2	44
CHESTER	1	0	15	2	18
LINCOLN COUNTY	27	24	15	14	80
EUREKA	1	24	23	14	62
LIBBY	1	24	23	14	62
TROY	15	24	15	14	68
MCCONE COUNTY	27	15	15	14	71
CIRCLE	15	15	15	14	59
MADISON COUNTY	27	24	23	14	88
ENNIS	1	24	15	14	54
SHERIDAN	27	24	5	14	70
TWIN BRIDGES	15	24	5	14	58
VIRGINIA CITY	15	24	15	14	68
MEAGHER COUNTY	27	0	23	14	64
WHITE SULPHUR SPRINGS	27	0	5	14	46
MINERAL COUNTY	27	15	23	14	79
ALBERTON	27	15	5	14	61
SUPERIOR	15	15	5	14	49
MISSOULA COUNTY	15	0	15	2	32
MISSOULA	27	0	15	2	44
MUSSELSHELL COUNTY	27	24	5	14	70
MELSTONE	15	24	15	14	68
ROUNDUP	15	24	23	14	76
PARK COUNTY	15	24	15	14	68
CLYDE PARK	1	24	5	14	44
LIVINGSTON	1	24	15	14	54

Local Government	Housing Inadequacy Score	Employment Conditions Score	Local Efforts Score	Per Capita Income Score	Composite Score
PETROLEUM COUNTY	27	0	15	14	56
WINNETT	27	0	23	14	64
PHILLIPS COUNTY	27	0	5	14	46
DODSON	15	0	15	14	44
MALTA	1	0	15	14	30
SACO	1	0	23	14	38
PONDERA COUNTY	27	0	5	2	34
CONRAD	1	0	23	2	26
VALIER	15	0	15	2	32
POWDER RIVER COUNTY	27	0	5	14	46
BROADUS	1	0	23	14	38
POWELL COUNTY	27	24	15	14	80
DEER LODGE	1	24	5	14	44
PRAIRIE COUNTY	27	15	23	14	79
TERRY	15	15	23	14	67
RAVALLI COUNTY	27	14	23	14	79
DARBY	1	15	23	14	53
HAMILTON	15	15	5	14	49
STEVENSVILLE	1	15	23	14	53
RICHLAND COUNTY	15	0	5	2	22
FAIRVIEW	15	0	15	2	32
SIDNEY	1	0	15	2	18
ROOSEVELT COUNTY	27	15	5	2	49
BAINEVILLE	27	15	5	2	49
CULBERTSON	27	15	15	2	59
FROID	27	15	15	2	59
BROCKTON	27	15	5	2	49
POPLAR	15	15	23	2	55
WOLF POINT	1	15	15	2	33
ROSEBUD COUNTY	27	24	5	14	70
FORSYTH	15	24	23	14	76
SANDERS COUNTY	27	24	15	14	80
HOT SPRINGS	27	24	23	14	88
PLAINS	1	24	5	14	44
THOMPSON FALLS	1	24	5	14	44
SHERIDAN COUNTY	15	0	5	2	22
MEDICINE LAKE	1	0	15	2	18
OUTLOOK	15	0	5	2	22
PLENTYWOOD	1	0	15	2	18
WESTBY	15	0	23	2	40

Local Government	Housing Inadequacy Score	Employment Conditions Score	Local Efforts Score	Per Capita Income Score	Composite Score
SILVER BOW COUNTY	27	24	23	2	76
BUTTE	27	24	23	2	76
WALKERVILLE	1	24	5	2	32
STILLWATER COUNTY	15	0	15	2	32
COLUMBUS	1	0	5	2	8
SWEET GRASS COUNTY	27	0	23	14	64
BIG TIMBER	1	0	5	14	20
TETON COUNTY	27	15	23	2	67
CHOTEAU	15	15	15	2	47
DUTTON	1	15	23	2	41
FAIRFIELD	15	15	23	2	55
TOOLE COUNTY	27	15	23	2	67
SHELBY	1	15	15	2	33
KEVIN	1	15	23	2	41
SUNBURST	1	15	23	2	41
TREASURE COUNTY	27	24	23	2	76
HYSHAM	15	24	15	2	56
VALLEY COUNTY	15	24	15	14	68
OPHEIM	15	24	15	14	68
GLASGOW	1	24	23	14	62
NASHUA	1	24	15	14	54
WHEATLAND COUNTY	27	24	15	2	68
HARLOWTON	1	24	23	2	50
JUDITH GAP	1	24	5	2	32
WIBAUX COUNTY	15	0	5	2	22
WIBAUX	1	0	15	2	18
YELLOWSTONE COUNTY	15	0	5	2	22
LAUREL	1	0	23	2	26
BROADVIEW	1	0	5	2	8

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